

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

FILED
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U.S. BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:)
) Chapter 13
Ronald B. Cameron, Jr.,)
)
Debtor,) Case No. 00-05763
)
)
_____)

MOTION TO SELL PROPERTY

Debtor, by his counsel, hereby moves before this Court for an Order allowing Debtor to sell his residence located at 148 Forty Love Point, Chapin, South Carolina. In support of such, Debtor would show this Court the following:

1. Debtor filed a Petition for Relief under Chapter 13 of the Bankruptcy Code on or about July 12, 2000. Debtor's confirmed Chapter 13 Plan pays 100% to unsecured creditors.
2. Debtor is the owner of a residence located at 148 Forty Love Point, Chapin, South Carolina.
3. First Union is the holder of a secured claim against Debtor, as evidenced by a mortgage on the above-described residence with a payoff of approximately \$100,000.00.
4. Mortgage Lenders Network USA is the holder of a secured claim against Debtor, as evidenced by a second mortgage on the above-described residence with a payoff of approximately \$75,000.00.
5. Debtor has relocated to Virginia and has secured a contract of sale with a purchase price on the residence of \$323,000.00.
6. Debtor is informed and believes that the purchase price is more than sufficient to pay off both mortgages, pay off the balance of the Chapter 13 Plan, and have the remainder

disbursed to the Debtor.

7. Debtor believes that it is in the best interests of the creditors and the Debtor for the house to be sold, as the sales price will be sufficient to pay all claims in full.

WHEREFORE, Debtor moves before this Court for an Order allowing Debtor to sell the above-described residence, pay off the first and second mortgages, pay all closing costs, pay off the balance of the Chapter 13 Plan to the Trustee, and have the remainder of the proceeds disbursed to the Debtor directly from the trust account of the closing attorney.

Respectfully submitted.

MOSS & REED, P.A.

By: 

Jason T. Moss

Federal I.D. No. 7240

Eric S. Reed

Federal I.D. No. 7242

2000 Park Street, Suite 101

Columbia, South Carolina 29201

(803) 933-0202

Attorneys for the Debtor

Columbia, South Carolina

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